Case 1:17-cr-00683-LAP Document 82 Filed 07/25/18 Page 1 of 2

SHER TREMONTE LLP

July 25, 2018

BY ECF

The Honorable Loretta A. Preska United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 T-26-D

Re: United States v. Person, et al., No. 17 Cr. 683 (LAP)

Dear Judge Preska:

We represent Chuck Person in the above-referenced case and write to request a modification of the conditions of Mr. Person's pretrial release.

On October 10, 2017, the Honorable Katherine H. Parker set conditions of Mr. Person's release that restricted Mr. Person's travel to the Middle District of Alabama, where he resides, and the Southern and Eastern Districts of New York (as well as all points in between for the purpose of traveling to meet with counsel or to attend court proceedings). (ECF No. 9.) By Order dated November 16, 2017, the Court expanded the scope of Mr. Person's permitted travel to include the Northern and Southern Districts of Alabama. (ECF No. 20.)

We respectfully request that the Court modify the conditions of Mr. Person's release so that he is permitted to travel generally in the Northern District of Georgia. Mr. Person's fiancée recently secured employment near Atlanta, Georgia, and she and Mr. Person have jointly purchased a home in Milton, Georgia, which is a suburb of Atlanta. The transaction is scheduled to close on July 26, and Mr. Person and his fiancée have a scheduled move-in date of August 10. Mr. Person has kept Pretrial Services fully apprised of his plans to move to the Atlanta area, and Pretrial Services consents to this request. We have also conferred with Assistant U.S. Attorney Noah Solowiejczyk, who has no objection to this request.

Mr. Person will remain obligated to comply with the other conditions of his release, including pretrial supervision as directed by Pretrial Services.

30 ORDEREI

WWW W BOARDAD STREET | 23RD FLOOR | NEW YORK, NY 10004

ORETTA A. PRESKAWWW.SHERTREMONTE.COM | TEL 212.202.2600 | FAX 212.202.4156

UNITED STATES DISTRICT JUDGE

7/25/18

Case 1:17-cr-00683-LAP Document 82 Filed 07/25/18 Page 2 of 2

Hon. Loretta A. Preska July 25, 2018 Page 2

We appreciate the Court's consideration.

Respectfully submitted,

/s/ Michael W. Gibaldi

Michael W. Gibaldi

cc: Counsel of record (by ECF)